

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 v.) No. 4:22 MJ 8129 SRW
 JEROME WILLIAMS,)
)
 Defendant.)
)

Comes now the United States of America, by and through its attorneys, Saylor A. Fleming, United States Attorney for the Eastern District of Missouri, and Nathan Chapman and Angie E. Danis, Assistant United States Attorneys for said District, and move this Court to order the defendant detained pending trial, and further requests that a detention hearing be held at the time defendant's initial appearance before the United States Magistrate Judge pursuant to Title 18, United States Code, Section 3141, et. seq., and per current guidance from the Court.

Presumption of Detention

The Nature and Circumstances of the Offense

2. Title 18, United States Code, Section 3142(g) requires this Court to consider the nature and characteristics of the offense charged, including whether the offense is a controlled substance offense or a crime of violence. The instant charge is not considered a crime of violence,

but as evidenced in the Complaint Affidavit, the instant offense involves the destruction of evidence relative to a murder.

The Weight of the Evidence Against the Defendant

3. Section 3142(g)(2) requires this Court to consider the weight of the evidence against the defendant. The government submits that the evidence against the defendant is strong and relies on the facts as articulated in the Complaint Affidavit in reliance on same.

The History and Characteristics of the Defendant

4. The defendant is currently on supervised release after having served 420 months in the Bureau of Prisons for charges of kidnapping resulting in death. He was released in 2021.

The Nature and Seriousness of the Danger to the Community

5. The defendant engaged in the destruction of direct evidence of the murder of T.A. Furthermore, given how briefly T.A. was in St. Louis prior to being murdered (less than one hour after his flight landed), the Government believes that this homicide was planned.

Risk of Flight

6. There a serious risk that the defendant will flee because she is facing a significant sentence in this case, based on the severity of the charges and his alleged role in the offense and further potential charges relating to the homicide of T.A.

Conclusion

7. The government submits that when considering all of the factors outlined in Title 18, United States Code, § 3142(g), the factors weigh heavily in favor of detention. There is clear and convincing evidence that no condition or combination of conditions that will reasonably assure

the safety of any other person and the community as well as the appearance of the defendant.

Respectfully submitted,

SAYLER A. FLEMING
United States Attorney

/s/ Nathan Chapman
NATHAN CHAPMAN, #60978MO
ANGIE E. DANIS, #64805MO
Assistant United States Attorneys